

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

CHANCE WILSON

Plaintiff

vs.

CONSUMER LEGAL GROUP P.C.  
AND PHOENIX DEBT PROS, INC.  
Defendants.

Case No. 1:24-cv-02276

**JURY TRIAL DEMANDED**

**REQUEST TO APPEAR TELEPHONICALLY AT PRE-MOTION CONFERENCE**

COMES NOW Plaintiff Chance Wilson, by and through the undersigned counsel, and respectfully requests that the Court permit the undersigned counsel to appear telephonically at the hearing scheduled for the pre-motion conference scheduled for September 9, 2024 at 2:00 PM. In support thereof, counsel states that he is physically located in and has his offices in Pennsylvania, and his Co-Counsel is located in Massachusetts, who is in deposition all day and will not be attending. The undersigned counsel is also scheduled for a virtual Rule 16 Conference in another jurisdiction at 4:30 PM Eastern Time. Therefore, for the convenience of counsel, the undersigned respectfully requests leave to appear telephonically and/or virtually at the pre-motion conference.

Counsel for the Plaintiff has conferred with counsel for the Defendant, who does not oppose the relief sought.

**CONCLUSION**

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the undersigned counsel be permitted to appear telephonically and/or virtually for the upcoming September 9 pre-motion conference.

RESPECTFULLY SUBMITTED AND DATED this September 4, 2024.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
(Pro Hac Vice)  
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**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

Dated: September 4, 2024

/s/ Andrew Roman Perrong  
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